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**Counsel for Membership
Marketing Partners, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
(DALLAS DIVISION)**

IN RE:	§	
	§	CHAPTER 11
NATIONAL RIFLE ASSOCIATION	§	
OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh-11
	§	
DEBTORS. ¹	§	JOINTLY ADMINISTERED
	§	

**MMP'S REQUEST FOR EMERGENCY CONSIDERATION OF MOTION FOR AN
ORDER REQUIRING THE UNITED STATES TRUSTEE TO RECONSTITUTE THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Creditor and party-in-interest Membership Marketing Partners, LLC ("MMP") files this *Request for Emergency Consideration of Motion for an Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors* (the "**Motion**"), and

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

for the reasons articulated below, MMP requests that the Motion be heard on an emergency basis.

Emergency consideration of the Motion is necessary because, according to the United States Trustee, the Official Committee of Unsecured Creditors (the “OCC”) has already begun meeting and conducting business, and any delay in providing the relief sought in the Motion will be prejudicial and harmful to the unsecured creditors who deserve fair and adequate representation on the OCC.

WHEREFORE, PREMISES CONSIDERED, MMP respectfully requests that the Court enter an order granting this request and setting the Motion for hearing no later than Friday, February 19, 2021.

Dated: February 16, 2021

By: /s/ Judith W. Ross
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**Counsel to Membership Marketing
Partners, LLC**

CERTIFICATE OF CONFERENCE

I certify that on February 15 2021, I attempted to confer via email with Lisa Lambert with the United States Trustee's office regarding this request for emergency consideration of the Motion. As of the time of filing of the Motion Ms. Lambert has not yet responded.

/s/ Judith W. Ross
Judith W. Ross

DECLARATION REGARDING FACTS IN SUPPORT OF RELIEF

Pursuant to 28 U.S.C. § 1746, I, Judith W. Ross, declare under penalty of perjury that the foregoing facts in support of emergency relief are true and accurate to the best of my knowledge and belief.

/s/ Judith W. Ross
Judith W. Ross

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a true and correct copy of the above and foregoing document on February 16, 2021 via ECF-Electronic Notice on parties receiving ECF-Notice in this case and by email and/or United States mail as indicated below in the Master Service List.

/s/ Judith W. Ross
Judith W. Ross

**Master Service List
National Rifle Association of America
Case No. 21-30085**

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Fairfax, VA 22030

Served via U.S. mail

Sea Girt LLC
11250 Waples Mall Road
Fairfax, VA 22030

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20 Largest Unsecured Creditors:

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Fairfax, VA 22030

Served via U.S. mail

Gould Paper Corporation

Attn: Warren Connor

99 Park Avenue, 10th Floor

New York, NY 10016

Served via U.S. mail

Under Wild Skies

201 N. Union Street, Suite 510

Alexandria, VA 22314

Served via U.S. mail

Quadgraphics

N63W23075 Hwy. 74

Sussex, WI 53089

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Membership Advisors Fund Raising

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Fairfax, VA 22030

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105 Commerce Drive

Aston, PA 19014

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Infocision Management Corp.

325 Springside Drive

Akron, OH 44333

Served via U.S. mail

Valtim Incorporated

P.O. Box 114

Forest, VA 24551

Served via U.S. mail

Communications Corp of America

Attn: Ken Bentley

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Elkwood, VA 22718

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One Mark St. – The Landmark, Suite 300

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